

Schiff, Andrew O. (USAALM)

From: Katie Lasky (344 N.O.) [LaskyK@phelps.com]
Sent: Monday, December 11, 2006 3:23 PM
To: Schiff, Andrew O. (USAALM)
Cc: Brent Barriere (210 N.O.)
Subject: RE: Terry, Roy--Motion to Postpone Report Date

Mr. Schiff-

On behalf of the Trustee, J. Lester Alexander, III, I offer you the following response to Roy Terry's Motion to Postpone Report Date. Mr. Terry is a named defendant in litigation brought by the Trustee and currently pending in Alabama state court in Randolph County. While the deposition of Mr. Terry will need to be taken in conjunction with that litigation, we do not have a date certain for that deposition and have no ability to ensure that it will occur before March of 2007. Further, while all parties would agree that it is likely easier to take Mr. Terry's deposition before he reports, the Trustee and his counsel are fully prepared to work with the Bureau of Prisons to facilitate Mr. Terry's deposition once he is incarcerated.

Thank you,

Katie Lasky

-----Original Message-----

From: Schiff, Andrew O. (USAALM) [mailto:Andrew.Schiff@usdoj.gov]
Sent: Tuesday, December 05, 2006 5:12 PM
To: Katie Lasky (344 N.O.)
Subject: FW: Terry, Roy--Motion to Postpone Report Date

From: Schiff, Andrew O. (USAALM)
Sent: Monday, December 04, 2006 1:14 PM
To: barrierb@phelps.com
Subject: Terry, Roy--Motion to Postpone Report Date

Mr. Barrier: I'd appreciate it if you could read the attached (it's only three pages) and give me a call.
Thanks, Andy Schiff

Andrew O. Schiff
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<<continuance_motion.pdf>>

EXHIBIT A

12/11/2006